

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,
Plaintiff,

v.

The City of Nashua, *et al.*,
Defendants.

Civil Action No. 1:22-cv-00326-LM

INDEX OF PHOTOS OF CITY HALL
DEFENDANTS' EXHIBIT Q

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following index for Exhibit Q for trial:

EXHIBIT Q	
Page	Description
1	3 rd floor landing, view of elevator and hallway leading to auditorium and Legal Office
2	3 rd floor landing, view of IT office door and Legal conference room door
3	3 rd floor, view of Auditorium and hallway leading to Legal Office door and audio room
4	3 rd floor, view of elevator and hallway leading to auditorium and Legal Office
5	3 rd floor, view of hallway leading to Legal Office door and audio room
6	Aldermanic Chamber
7.	Continuation of second floor hallway outside Community Development, leads to stairwell that exits on Elm Street
8.	Continuation of second floor hallway outside Community Development, view 1
9.	Continuation of second floor hallway outside Community Development, view 2
10.	Continuation of second floor hallway outside Community Development, view 3
11.	Entrance to Lower Level Assessing Department
12.	First floor hallway – door to Administrative Services

13.	First floor hallway – left side Administrative Services; right side Tax Office
14.	First floor hallway leading from Elm Street side of building toward rotunda (Main Street)
15.	First floor hallway to Ladies’ Room
16.	First floor hallway to rotunda
17.	First floor hallway to rotunda
18.	First floor rotunda – elevator
19.	First floor rotunda – view of Risk Department – first floor
20.	First floor rotunda (Risk side) stairs to side entrance
21.	First floor rotunda door to Risk Department
22.	First floor rotunda elevator side stairs to side entrance
23.	First floor rotunda main staircase
24.	First floor motor vehicle office
25.	First floor stairwell (Elm Street side) leading up to second floor (Community Development)
26.	First floor stairwell (Elm Street side)
27.	Hallway-stairs, second floor, leading from Aldermanic Chamber toward Community Development – looking down
28.	Hallway-stairs, second floor, leading from Aldermanic Chamber toward Community Development – looking up
29.	Lower level door to side entrance 2 (alleyway)
30.	Lower level elevator and door to printing department
31.	Lower level hallway – view towards purchasing and accounts payable
32.	Lower level hallway 2 – on the right small hallway to second side entrance and door to employee breakroom
33.	Lower level hallway 2 – view to steps to hallway 1
34.	Lower level hallway leading to “cage” and mailboxes, employee breakroom on right
35.	Lower level stairwell leading up to first floor (Elm Street side of City Hall) – view 2
36.	Lower level stairwell leading up to first floor (Elm Street side of City Hall) – view 3

37.	Lower level stairwell leading up to first floor (Elm Street side of City Hall)
38.	Lower level view from door to side entrance 2 to hallway 2
39.	Main Street entrance first floor hallway to rotunda
40.	Main Street entrance hallway to rotunda and motor vehicle department
41.	Maintenance door and entrance to Assessing Department, public area
42.	On the right (elevator 2) and steps to 2 nd lower level hallway
43.	Restrooms next to side entrance
44.	Second floor hallway outside of Community Development offices
45.	Second floor landing – view of main stairwell leading up to third floor
46.	Second floor landing – view of Aldermanic Chamber, toward Community Development offices
47.	Second floor landing – view of Mayor’s Office and Economic Development offices’ doors
48.	Side entrance stairway to lower level Assessing Department
49.	Side entrance to City Hall
50.	Side entrance view of the alleyway to bus station
51.	Side entrance of the alleyway to Main Street
52.	Main stairwell leading up to third floor (view is looking down at second floor landing)
53.	Main stairwell, leading to third floor, left side
54.	Main stairwell, leading to third floor, right side
55.	Main Street Entrance
56.	View from Elm Street side stairwell on second floor. Public cannot access this stairwell beyond second floor.
57.	View from Elm Street side stairwell, walking up into hallway outside of Community Development
58.	View of third floor landing from outside Auditorium; Legal Office to the right
59.	View of Aldermanic Chamber and hallway (to left) leading to Legislative Services
60.	View of Assessing public area and towards first hallway
61.	View of lower level hallway 2 – top of steps

62.	View of public area for the tax office – first floor
63.	View of rotunda from main stairwell leading up to second floor
64.	View of second floor from main stairwell (left side)
65.	View of second floor from main stairwell (right side)
	Video – tour of City Hall

Respectfully submitted,

Steven A. Bolton and Celia K. Leonard,

By their Counsel,

UPTON & HATFIELD, LLP,

Date: March 24, 2025

/s/ Russell F. Hilliard
Russell F. Hilliard; NHBA #1159
159 Middle Street
Portsmouth, NH 03801
(603) 436-7046
rhilliard@uptonhatfield.com

Brooke Lovett Shilo; NHBA #20794
10 Centre Street; PO Box 1090
Concord, NH 03302-1090
(603) 224-7791
bshilo@uptonhatfield.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded on this day to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard
Russell F. Hilliard